September 29, 1998

To: John O'Grady
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson
Chicago, Illinois 60604

From: Raghavender Nagam
START Project Manager

Subject: Clarification on CEIs' September 18, 1998 Letter to U.S. EPA on Site Investigation Work Plan for Vacant Lot/Fansteel
North Chicago, Illinois
TDD: S05-9712-012
PAN: 7D1201SIXX

Dear Mr. O'Grady:

The Ecology and Environment, Inc. (E & E), Superfund Technical Assessment and Response Team (START) provides the following clarifications for the above mentioned letter.

Please call me if you have any questions.

Sincerely,

Raghavender Nagam

The following clarifications are provided for CEIs' letter of September 18, 1998 regarding Site Investigation Work Plan for Fansteel, Inc.

Comment #3:

- "all soil and sediment samples should be analyzed for PAH compounds...". Should CEI interpret this comment as a requirement to analyze samples from the boring locations (on Fansteels' property) for PAHs?

Clarification:

- CEIs' interpretation of this comment is correct. If not all samples, a representative portion of soil samples (approximately 20%) from different depths should be analyzed for PAHs. For example, a 0 to 6-inch sample from one boring location could be analyzed for PAHs (instead of the entire boring core) while a different depth sample may be chosen from a different boring location.

Comment #18:

X "... from the 48-inch Geoprobe sampling sleeve into two separate samples, each representative of a 24-inch sample interval. It is unclear to CEI if this comment indicates a requirement to:

(1) ensure the first sample interval includes 0-12 inches (i.e., 0-24 inches would be the first interval according to CEIs' proposed sampling):

(2) collect a discrete sample fro m 0-12 inches;

(3) divide each 48-inch soil core into four samples; or

(4) use a 12-inch Geoprobe sampling sleeve (typically, CEI uses either a 24-inch or 48-inch sleeve).

Clarification for (1):

X The first sample interval should be between 0 to 12 inches (If in a vegetation area, remove the top soil, and collect the sample - i.e; 2 to 12-inches. Risk evaluation is usually based on 0 to 6-inch interval samples.

Clarification for (2):

- Usually a composite sample will suffice for PAH analysis.

Clarification for (3) and (4):

- CEI may collect samples by dividing 48-inch soil core into four samples.

Comment #64:

- CEI does not understand what is meant by "reaction procedures".

Clarification:

- This statement appears to be about "reduction procedures" for pH, temperature, and conductivity readings taken in the field. Please include a brief statement about pH, temperature, and conductivity meters/instruments that will be used in the field (direct-read measurement instruments or other type of instruments). If they are not direct-read instruments, indicate how the field data will be reduced and interpreted for site characterization.

Comment #92:

- CEI does not understand to what "self-audit site inspection and abatement tracking programs" pertain.

Clarification:

- Prior to conducting sampling, CEI should finalize standards and protocols that ill be implemented during self-audit site inspections and abatement tracking programs. If CEI already has a generic plan, this plan/protocols could be referred as an attachment or be included in the CEI Quality Assurance Project Plan.